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LAW OFFICES  
LEVENTHAL, SENTER & LERMAN  
SUITE 600  
2000 K STREET, N.W.  
WASHINGTON, D.C. 20006-1809

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TELEPHONE  
(202) 429-8970

TELECOPIER  
(202) 293-7783

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CONSULTANT  
MORTON I. HAMBURG

May 18, 1995

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DAVID S. KEIR  
DEBORAH R. COLEMAN  
BERNARD A. SOLNIK\*\*  
NANCY A. ORY  
WALTER P. JACOB  
LINDA D. FELDMANN  
RENÉE L. ROLAND\*

\*ADMITTED MD ONLY

\*\*ADMITTED NY & CT ONLY

**BY HAND**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Presentation of TRW Inc. in  
CC Docket No. 92-297

Dear Mr. Caton:

By this letter, TRW Inc., through undersigned counsel, hereby submits the following comments and proposal with respect to the Commission's ongoing rulemaking proceeding in CC Docket No. 92-297. On May 11 and May 12, two groups of parties interested in the proceedings in CC Docket No. 92-297 submitted proposed allocation plans for the 27.0-30.5 GHz and 27.5-30.0 GHz bands respectively, in separate attempts to prompt resolution of the conflicting demands for available spectrum in those bands by the proposed Local Multipoint Distribution Service ("LMDS"), applicants for geostationary Fixed-Satellite Service ("FSS") systems, applicants for nongeostationary FSS systems, and by applicants for nongeostationary Mobile-Satellite Service ("MSS") systems that would use the FSS allocations at Ka-band to satisfy their feeder link requirements. By this letter, TRW responds briefly to the recently-filed proposals, and outlines a new proposal that it believes represents a fair and forward-thinking resolution to the conflicting demands.

TRW has examined the two recently-filed proposals carefully. Both plans call for MSS feeder link users to share the entire band segment 29.0-29.5 GHz

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on a co-primary basis with the LMDS. TRW knows of no scenario under which an LMDS system and the transmitter of an MSS feeder link gateway earth station can operate in the same geographic area. The interference from the MSS station to LMDS receivers even as distant as 40 kilometers will prevent the LMDS transmissions from being received. To complicate matters, the prospects for intraservice sharing between nongeostationary MSS feeder link networks, though promising under certain conditions, require much further study. These studies are ongoing among the two nongeostationary MSS feeder link systems that currently propose to use Ka-band spectrum, but there are, as yet, no plans to expand the study to include the prospect -- identified by the Commission both in its second notice of proposed rule making in CC Docket No. 92-297 and in the recently concluded MSS Above 1 GHz rulemaking proceeding in CC Docket No. 92-166 -- that the feeder link requirements of all six of the original MSS Above 1 GHz applicants will have to be satisfied in the companion 17.7-20.2 GHz and 27.5-30.0 GHz bands.

Under all of the circumstances, and in an attempt to forge a fair and reasonable compromise that accommodates the stated desires of the various constituencies this proceeding has generated, TRW has developed a spectrum allocation plan for the 27.5-30.0 GHz band that varies slightly, but significantly, from those presented to the Commission on May 11 and May 12. TRW's plan, which is attached hereto, would give each category of service less spectrum than the proponent or proponents of that category have sought. Like the plan filed on May 12, the attached plan encompasses only the currently-available spectrum at 27.5-30.0 GHz, as it is unreasonable to require any group that desires expeditious access to spectrum to accept an allocation that may never become available. The TRW plan:

- Provides 925 MHz of spectrum -- 725 MHz of which would be available on an exclusive primary basis, and 200 MHz of which would be shared on a co-primary basis with non-geostationary MSS feeder links (see below) -- to the LMDS. This is a reduction of only 7.5% from the per-system spectrum allocation proposed in CC Docket No. 92-297.
- Designates 400 MHz of spectrum primarily for nongeostationary FSS systems such as the one proposed by Teledesic Corporation. This proposed assignment corresponds precisely with the spectrum assignment requested in Teledesic's application for its so-called "Standard" terminals.

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- Designates 875 MHz of spectrum primarily for geostationary FSS systems. This is a reduction of 12.5% from the 1000 MHz specified in the application of Hughes Communications Galaxy, Inc., but is consistent with that company's stated desire to maintain an allocation divisible into 125 MHz segments.
- Provides 200 MHz of spectrum that would be shared on a co-primary basis between the LMDS and nongeostationary MSS feeder link networks, and designates an additional 300 MHz of spectrum primarily for nongeostationary MSS system feeder links. These two band segments would be available for use by the up to six currently authorized and proposed MSS Above 1 GHz systems that may require access to these bands -- as compared with the current proposals of TRW and Motorola Satellite Communications, Inc., which, by themselves, propose to use 500 MHz of spectrum for their nongeostationary MSS systems' feeder links.

TRW believes that in the Attachment, it has crafted a truly successful compromise -- i.e., one that gives no one exactly what they want, but gives everyone what they need. This proposal is capable of immediate implementation, and can accommodate the later availability of the 27.0-27.5 GHz band without disruption of the plan for the currently-available band.

TRW urges all interests to weigh the relatively nominal sacrifices each is requested to make hereunder against the impact that protracted controversy will have on the initiation of their service concepts. It believes that, on balance, the

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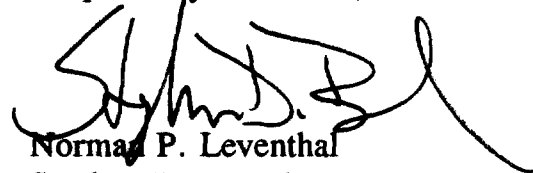
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plan proposed herein is clearly to be preferred, and encourages the Commission to proceed with all expedition to implement this plan in its forthcoming decision in CC Docket No. 92-297.

Respectfully submitted,



Norman P. Leventhal  
Stephen D. Baruch

Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Attorneys for TRW Inc.

Attachment

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cc: Chairman Reed E. Hundt  
Commissioner James C. Quello  
Commissioner Andrew C. Barrett  
Commissioner Susan Ness  
Commissioner Rachelle Chong  
Scott Blake Harris  
Thomas Tycz  
Cecily Holiday  
Donna Bethea  
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Lisa B. Smith  
Jane Mago  
Jill Lockett  
David R. Siddall  
Mary P. McManus

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ATTACHMENT

## **TRW SPECTRUM PROPOSAL FOR 27.5-30.0 GHz**

27.5 GHz	28.225 GHz	28.625 GHz	29.0 GHz	29.2 GHz	29.5 GHz	30.0 GHz
→725 MHz←	→400 MHz←	→375 MHz←	→200 MHz←	→300 MHz←	→500 MHz←	
LMDS	NGSO FSS	GEO FSS ngso fss	LMDS/NGSO MSS FEEDER LINKS	NGSO MSS FEEDER LINKS	GEO FSS/MSS ngso fss	